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September 22, 2020

Via ECF

The Honorable Lois Bloom
United States District Court for the Eastern District of New York
Theodore Roosevelt United States Courthouse
225 Cadman Plaza East
Brooklyn, NY 11201

Re: Capogrosso v. Gelbstein, et al., No. 18 Civ. 2710 (MKB) (LB)

Dear Judge Bloom,

This Office represents Defendants Alan Gelbstein, Ida Traschen, and Danielle Calvo, in their individual capacities, and Mark Schroeder, in his official capacity as Commissioner of the New York State Department of Motor Vehicles ("DMV") (together, the "State Defendants"), in the above-referenced matter. I write with the consent of the *pro se* attorney Plaintiff to request a thirty-day extension of both sides' time to respond to currently-pending discovery requests.

Under the proposed new schedule, the State Defendants' responses to the Plaintiff's first set of discovery requests, currently due September 24, would be due on October 26. The State Defendants' responses to the Plaintiff's second and third sets of document requests, currently due on October 2, would be due November 2. The Plaintiff's responses to the State Defendants' document requests, currently due on October 9, would be due November 9. The Plaintiff's responses to the State Defendants' interrogatories, currently due on October 15, would be due November 16.

As several of the the proposed dates for the parties responses are after the currently-scheduled October 16 discovery deadline, and as the Plaintiff has requested time after the production of documents to review discovery and conduct depositions, we further request that the deadline for discovery be adjourned, to November 30, 2020, with summary judgment pre-motion letters due two weeks later, on December 14. We thank the Court for its time and consideration.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'James M. Thompson', is written over a horizontal line.

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